

Exhibit A

1
2 **UNITED STATES DISTRICT COURT**
3 **NORTHERN DISTRICT OF CALIFORNIA**
4 **OAKLAND DIVISION**

5
6 IN RE: CATHODE RAY TUBE (CRT)
7 ANTITRUST LITIGATION

Case No.: 4:08-cv-01559

Master File No. 4:07-cv-05944-JST

MDL No. 1917

8
9 This document relates to:

10
11 ANTHONY GIANASCA AND
12 BARBARA CALDWELL
13 *on behalf of themselves and all
others similarly situated,*

14
15 Plaintiffs,

v.

16
17 LG ELECTRONICS, INC., et al.,

18
19 Defendants.

20
21 **DECLARATION OF VANESSA G. JACOBSEN IN SUPPORT OF LGE'S OPPOSITION TO**
22 **MOTION TO AMEND COMPLAINT OR OTHERWISE PURSUE PENDING CLAIMS**

23
24 I, Vanessa G. Jacobsen, declare as follows:

25
26 1. I am an attorney admitted to the Bar of the State of Illinois and admitted *pro hac vice*
27 in this Court. I am an attorney at the law firm of Eimer Stahl LLP. I represent LG Electronics, Inc.,
28 LG Electronics USA, Inc., and LG Electronics Taiwan Taipei Co., Ltd. (collectively "LGE") and
have personal knowledge of the facts set forth below.

29
30 2. I submit this declaration in support of LGE's Opposition to Motion to Amend
Complaint or Otherwise Pursue Pending Claims.

31
32 3. Attached as Exhibit 1 to this declaration is a true and correct copy of email
33 correspondence culminating on September 21, 2022, between myself, Nathan P. Eimer, Robert J.
34 Bonsignore, and Frances Whitaker.

4. Attached as Exhibit 2 to this declaration is a true and correct copy of email correspondence culminating on September 27, 2022, between myself, Nathan P. Eimer, Robert J. Bonsignore, Frances Whitaker, and Melanie Porter.

5. Attached as Exhibit 3 to this declaration is a true and correct copy of email correspondence culminating on October 6, 2022, between myself, Nathan P. Eimer, Robert J. Bonsignore, Frances Whitaker, and Melanie Porter.

I declare under penalty of perjury under the law of the United States of America that the foregoing is true and correct.

Executed this 10th day of October, 2022, in Chicago, Illinois.

/s/ Vanessa G. Jacobsen

Vanessa G. Jacobsen